

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

ALEXANDER AND SUSAN PROUT,)
as parents, next friends and legal guardians of F.P., a)
minor,)
Plaintiffs,) Civil Action No. 1:16-CV-00225-PB
v.)
ST. PAUL'S SCHOOL,)
Defendant.)

)

JOINT STATUS REPORT

Pursuant to this Court's order , Plaintiffs Alexander and Susan Prout, as parents, next friends and legal guardians of F.P., a minor, and Defendant St. Paul's School respectfully submit the following joint status report within 30 days of the scheduling conference.

DISCLOSURE OF CLAIMS AGAINST UNNAMED PARTIES.

The parties have reached a proposed agreement. If Defendant believes that unnamed parties are at fault under a state law claim (see *Debenedetto v. CLD Consulting Engineers*, 153 N.H. 793 (2006)), Defendant shall disclose the identity of every such person and the basis of the allegation of fault on or before January 15, 2017. Plaintiff shall then have 30 days from the date of the disclosure to amend the complaint.

ELECTRONIC INFORMATION DISCLOSURES.

The parties have conferred extensively on a discovery plan for ESI discovery and have reached a partial agreement. The parties attach a proposed ESI plan outlining areas of agreement and setting forth areas of disagreement. The parties welcome a status conference if the Court

seeks additional information for resolution of outstanding issues regarding ESI discovery under Fed.R. Civ.P. 26(f).

OTHER MATTERS:

There are no other matters to report to the Court at this time.

Dated: October 21, 2016

Respectfully submitted,

ST. PAUL'S SCHOOL,

By their attorneys,

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PROFESSIONAL ASSOCIATION

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and

ALEXANDER AND SUSAN PROUT, as parents,
next friends, and legal guardians of F.P., a minor

By their attorneys,

/s/ Charles G. Douglas

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